

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MILLENNIUM FUNDING, INC., SCREEN
MEDIA VENTURES, LLC, VOLTAGE
HOLDINGS, LLC, MILLENNIUM MEDIA,
INC., PARADOX STUDIOS, LLC,
DALLAS BUYERS CLUB, LLC,
WONDER ONE, LLC, FW
PRODUCTIONS, LLC, MILLENNIUM IP,
INC., I AM WRATH PRODUCTIONS,
INC., FAMILY OF THE YEAR
PRODUCTIONS, LLC, AMBI
DISTRIBUTION CORP., KILLING LINK
DISTRIBUTION, LLC, BADHOUSE
STUDIOS, LLC, LF2 PRODUCTIONS,
INC., LHF PRODUCTIONS, INC.,
LAUNDRY FILMS, INC., VENICE PI,
LLC, RAMBO V PRODUCTIONS, INC.,
SPEED KILLS PRODUCTIONS, INC.,
NIKOLA PRODUCTIONS, INC.,
BODYGUARD PRODUCTIONS, INC.,
OUTPOST PRODUCTIONS, INC.,
HITMAN 2 PRODUCTIONS, INC. and
MORGAN CREEK PRODUCTIONS, INC,

Plaintiffs,

v.

SURFSHARK LTD., KEEPSOLID, INC.
d/b/a/ VPN UNLIMITED, ZENGUARD
GMBH, EXPRESS VPN
INTERNATIONAL LTD (a BVI Limited
Company), EXPRESS VPN
INTERNATIONAL LTD (an Isle of Man
Limited Company), VPN CONSUMER
NETWORK and VPN CONSUMER
NETWORK SERVICES.,

Defendants.

Civil Action No. 1:21-cv-00643-RDA-IDD

JOINT NOTICE OF TENTATIVE SETTLEMENT

Plaintiffs MILLENNIUM FUNDING, INC., SCREEN MEDIA VENTURES, LLC,
VOLTAGE HOLDINGS, LLC, MILLENNIUM MEDIA, INC., PARADOX STUDIOS, LLC,

DALLAS BUYERS CLUB, LLC, WONDER ONE, LLC, FW PRODUCTIONS, LLC, MILLENNIUM IP, INC., I AM WRATH PRODUCTIONS, INC., FAMILY OF THE YEAR PRODUCTIONS, LLC, AMBI DISTRIBUTION CORP., KILLING LINK DISTRIBUTION, LLC, BADHOUSE STUDIOS, LLC, LF2 PRODUCTIONS, INC., LHF PRODUCTIONS, INC., LAUNDRY FILMS, INC., VENICE PI, LLC, RAMBO V PRODUCTIONS, INC., SPEED KILLS PRODUCTIONS, INC., NIKOLA PRODUCTIONS, INC., BODYGUARD PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., HITMAN 2 PRODUCTIONS, INC. and MORGAN CREEK PRODUCTIONS, INC. (“Plaintiffs”) and Defendant KEEPSOLID, INC. d/b/a VPN Unlimited (“KeepSolid”) (all collectively, “Parties”) provide notice to the Court that they have arrived at a tentative settlement of all claims.

The Parties, while reserving all of their respective rights, are diligently working to finalize their tentative settlement agreement. The Parties believe that it would be more fruitful for them to direct their efforts towards finalizing their tentative settlement agreement rather than engaging in motion practice. Their efforts, however, will be delayed because lead counsel for Plaintiffs (Kerry Culpepper) has a trial scheduled next week (December 6-10) in a different District that requires his attention.

Accordingly, for GOOD CAUSE, the Parties request that the Court extend KeepSolid’s deadline to answer/respond to the First Amended Complaint for 30 days to January 17, 2022 (January 15 being a Saturday) so that the Parties can endeavor to finalize and effectuate their tentative settlement agreement.

For the avoidance of doubt, this Notice does not apply to Defendants SURFSHARK LTD., ZENGUARD GMBH, EXPRESS VPN INTERNATIONAL LTD (a BVI Limited Company),

EXPRESS VPN INTERNATIONAL LTD (an Isle of Man Limited Company), VPN CONSUMER NETWORK and VPN CONSUMER NETWORK SERVICES.

Dated: November 30, 2021

Respectfully submitted,

/s/ Kerry S. Culpepper

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By: /s/ Clinton H. Brannon

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INC. d/b/a/
VPN UNLIMITED*

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2021, the foregoing was electronically filed and served on all counsel of through the Court's CM/ECF system, in accordance with the Court's electronic case filing policies and procedures:

By: /s/ Kerry S. Culpepper
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